

WA 8967  
7/7/2016  
4A

Region 10  
RCRA Oversight Inspection Report

This report is divided into two parts. Part 1 is used during the actual inspection to record observations made in the field. Part 2 is used to evaluate the State inspection report relative to field observations. Both parts of the oversight inspection report are completed by the EPA oversight inspector. In the remarks column, N/A may be appropriate in some instances.

State Inspectors: Jared Mathey

Date: 7/7/2016  
Insp. 6/25/2015

**PART 1**

I. Facility Name: USDOE Hanford, ETF/LERF  
ID #: WA7890008967

Facility Activities: ☐ Conditionally Exempt Small Quantity Generator

☐ Small Quantity Generator

☒ Large Quantity Generator

☒ Treatment/Storage/Disposal Facility

☐ Transporter

☒ Universal Waste

☐ Used Oil

II. Inspection Type: ☐ CEI ☐ O & M

☐ CME ☐ Lab Audit

☐ Financial Records Review ☐ Compliance Monitoring Evaluation

☐ Non Financial Records Review ☐ CDI

☒ Other (specify): CFI Focused on ETF/LERF activities only

Items to be Reviewed: ☒ Full Scope ☐ Limited Scope

Inspection Format: ☒ Joint Visit ☐ Independent Visit

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	<u>Yes</u>	<u>No</u>	<u>Remarks</u>
3. Did the inspector fail to note any violations or improper waste handling activities?	<u>      </u>	<u>  X  </u>	<u>                                </u>
4. Did the inspector fail to identify any hazardous waste handling areas not previously identified in previous reports or records?	<u>      </u>	<u>  X  </u>	<u>                                </u>
5. Upon identifying a potential violation, did the inspector initiate case development procedures (i.e., gather detailed evidence to support the findings of violations)?	<u>  X  </u>	<u>      </u>	<u>                                </u>
6. Did the inspector check the requirements for preparedness and prevention, including adequate aisle space, emergency equipment availability, and access to communications during hazardous waste handling operations?	<u>  X  </u>	<u>      </u>	<u>                                </u>
7. If applicable, was sampling performed by State personnel in accordance with standard operating procedures specified by the State and/or EPA?	<u>      </u>	<u>      </u>	<u>  NA                            </u>
8. Was proper safety and sampling equipment used to perform the sampling?	<u>      </u>	<u>      </u>	<u>  NA                            </u>
9. Was the inspector helpful to the owner/operator by providing explanation of the regulations?	<u>  X  </u>	<u>      </u>	<u>                                </u>
10. Was the inspector able to answer questions accurately or commit to provide answers at a later date?	<u>  X  </u>	<u>      </u>	<u>                                </u>
11. If the facility was permitted, did the inspector determine compliance with permit-specific conditions?	<u>  X  </u>	<u>      </u>	<u>                                </u>

	<u>Yes</u>	<u>No</u>	<u>Remarks</u>
12. Did the inspector perform an exit interview with the owner/operator summarizing the key findings of the inspection?	<u>X</u>	<u>    </u>	<u>                                    </u>

NOTE: The inspector should not make a finding of violation during the inspection, but should only discuss the findings.

**VII. Knowledge of the Regulations:**

1. Was the inspector knowledgeable about hazardous waste regulations applicable to the facility?	<u>X</u>	<u>    </u>	<u>                                    </u>
2. Was the inspector aware of recent amendments to the regulations that may affect the conduct of the inspection?	<u>X</u>	<u>    </u>	<u>                                    </u>

**VIII. Document Inspection (Review):**

(Please note if review was performed prior to or during inspection.)

Did the inspector thoroughly review the following documents:

A. <u>For Generators:</u>	<u>Yes</u>	<u>No</u>	<u>Remarks</u>
• Inspection records for hazardous waste storage areas	<u>X</u>	<u>    </u>	<u>                                    </u>
• Personnel training records	<u>X</u>	<u>    </u>	<u>                                    </u>
• Contingency plan	<u>X</u>	<u>    </u>	<u>                                    </u>
• Emergency equipment testing and maintenance records	<u>X</u>	<u>    </u>	<u>                                    </u>
• Waste analysis records	<u>X</u>	<u>    </u>	<u>                                    </u>
• Manifests and exception reports	<u>X</u>	<u>    </u>	<u>                                    </u>
• State annual and/or EPA biennial reports	<u>X</u>	<u>    </u>	<u>                                    </u>
• Waste minimization plan	<u>    </u>	<u>N</u>	<u>                                    </u>



- |  | <u>Yes</u> | <u>No</u> | <u>Remarks</u> |
|--|------------|-----------|----------------|
| 4. Did the report contain a discussion of changes that have occurred at the facility since the previous inspection?            | <u>X</u>   | ___       | _____          |
| If not, explain items that should have been included:  |            |           | _____<br>_____ |
| 5. Did the inspection report accurately reflect the EPA oversight inspector's observations?                                    | <u>X</u>   | ___       | _____          |
| If not, explain the differences:   |            |           | _____<br>_____ |
| 6. If non-compliance was identified, was the violator identified as either a Secondary Violator or a Significant non-complier? | <u>X</u>   | ___       | _____          |

**II. Remarks:**

1. What is your overall assessment of the inspection and the inspection report?

The inspector was well prepared and familiar with the facility. The inspection was thorough and conducted in a professional manner. The report was detailed and accurate and clearly identified all observed compliance issues.

2. Describe recommendations that may improve the quality of the State inspection and/or the inspection report.

No recommendations  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

NOTE: Indicate whether the inspector is in need of additional training or is lacking a particular skill (e.g. hazardous waste sampling) needed for an adequate inspection.

3. Comments on the inspection that could have a bearing on the State inspector evaluation (e.g., facility status under litigation, inadequate time allocated to perform inspection, complex industrial processes and waste handling practices, or numerous regulated units located on site).

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